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PROJECT NO. 52373

REVIEW OF WHOLESALE
ELECTRIC MARKET DESIGN

§ PUBLIC UTILITY COMMISSION
§
§ OF TEXAS

COMMENTS OF EXELON GENERATION COMPANY, LLC

Exelon Generation Company, LLC (“Exelon”)¹ appreciates the opportunity to comment on potential market reforms regarding demand response to support future reliability, and respectfully files these Comments with the Public Utility Commission of Texas (“Commission” or “PUCT”) to guide its upcoming work session on Market Design.

Exelon supports efforts at the Commission to integrate and expand the use of demand response to help meet the growing reliability needs of Texas. We commend the Commission for taking a holistic approach to market reform, recognizing the protocols work together in harmony and that modification to one aspect of the market will have impacts on other areas that must be considered and that all the market design objectives must be consistent with the policy goals established by the Commission.

In its comments provided on August 16, 2021 in response to Guidance 1, and as further articulated by Mr. Berg at the Commission’s August 26th workshop, Exelon proposed that four steps be taken as a holistic solution to accomplish the important policy goal of ensuring electricity reliability in Texas, including the development of a dispatchable ancillary services product and seasonal-specific requirements (“Dispatchable Firm Resources procurements”).² Recognizing that integrated solutions are more effective than piecemeal market changes, Exelon’s recommendations intentionally included demand response, which can and should be used as one of the tools that the Commission and ERCOT can use to maintain reliability under certain conditions.³

It is important that the Commission establish appropriate criteria and qualifications for participation of demand response resources in newly developed products, which allows ERCOT visibility into what is on the system and how those resources will behave, in order to achieve the desired reliability outcome for the grid. As Exelon previously noted, demand response should be allowed to participate in procurements of new products, if it meets qualification criteria.⁴

¹ Exelon Generation Company, LLC, through subsidiaries, owns 3,620 MWs of gas-fired capacity and 87 MWs of wind power in Texas. Exelon Generation Company, LLC also provides wholesale supply to a number of Texas cooperatives and municipalities.

² Comments of Exelon Generation, LLC, *Review of Wholesale Electric Market Design*, Project No. 52373, August 16, 2021.

³ *Id.*

⁴ *Id.*

Respectfully submitted,

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On behalf of Exelon Generation Company, LLC